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13 *Attorneys for Plaintiff*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DOCTOR AARON BOMER, an Individual,

17 Plaintiff,

18 vs.

19 STATE OF NEVADA-DIVISION OF
20 PUBLIC AND BEHAVIORAL HEALTH
(SOUTHERN NEVADA ADULT
21 MENTAL HEALTH SERVICES), a
22 division of the State of Nevada, JOANNE
23 MALAY, an individual, JACKIE
24 ARELLANO, an individual, JENNIFER
25 SEXTON, an individual,

26 Defendants.

CASE NO.: 2:20-cv-00182-JCM-BNW

**STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
DEFENDANTS' SPECIAL MOTION TO
DISMISS (ECF 13)**

(THIRD REQUEST)

27 The parties, by and through counsel of record, hereby stipulate and agree that Plaintiff
28 will be granted an extension until **May 26, 2020** to file and serve a response to Defendants'
Special Motion to Dismiss Plaintiff's Amended Complaint (ECF No. 13).

On or about January 29, 2020, Plaintiff filed his Amended Complaint. On or about
March 20, 2020, Defendant filed two Motions to Dismiss. On or about April 24, 2020, HKM
Employment Attorneys LLP ("HKM") was substituted as counsel of record for Plaintiff in place
of Mullins & Trenchak, Attorneys at Law. Defendant graciously granted HKM Employment

1 Attorneys LLP an extension until May 15, 2020 to respond to the Motions to Dismiss. On or
2 about May 15, 2020, the parties agreed to a second extension of time to submit a response to
3 the Motions until May 22, 2020 which also extended the deadline for Defendants to submit a
4 Reply in Support of their Motions.
5

6 Plaintiff's new counsel's continued review of the file and of the claims has proven more
7 protracted than originally anticipated. Plaintiff's counsel has managed to complete their
8 Response in Opposition to Defendants' Motion to Dismiss (ECF 12), which they willing be
9 filing today, but is still preparing a response to Defendants' complex Special Motion to Dismiss
10 (Anti Slapp) (ECF 13). In light of the complex nature of the Special Motion to Dismiss,
11 additional time is needed to review, research, and respond to each of Defendants' arguments.
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13 Accordingly, the Parties hereby agree to extend the time for Plaintiff's Response in
14 Opposition to the Special Motion to Dismiss to **May 26, 2020** which, with the intervening
15 Memorial Day holiday, constitutes a one (1) business day extension.
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1 This request for an extension is sought to accommodate Plaintiff's counsel's office and
2 staff, who are currently working remotely due to the COVID-19 pandemic, were only recently
3 retained in this matter, and who are diligently working to address all issues raised in the Special
4 Motion to Dismiss. Thus, this request is made in good faith and not for the purpose of delay.

5 Dated: May 22, 2020.
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8 HKM EMPLOYMENT ATTORNEYS
9 LLP

NEVADA OFFICE OF THE
ATTORNEY GENERAL

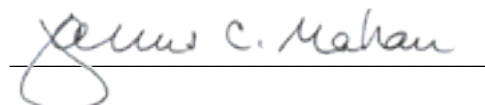
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21 **ORDER**

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23 IT IS SO ORDERED:

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26 UNITED STATES DISTRICT JUDGE

27 DATED: May 26, 2020
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